

Richard A. Harpootlian, *pro hac vice*  
*rah@harpootlianlaw.com*  
Phillip Barber, *pro hac vice*  
*pdb@harpootlianlaw.com*  
RICHARD A. HARPOOTLIAN, PA  
1410 Laurel Street  
Columbia, South Carolina 29201  
Telephone: (803) 252-4848  
Facsimile: (803) 252-4810

BRYAN M. SULLIVAN (SBN 209743)  
*bsullivan@earlysullivan.com*  
ZACHARY C. HANSEN (SBN 325128)  
*zhansen@earlysullivan.com*  
EARLY SULLIVAN WRIGHT GIZER & McRAE LLP  
6420 Wilshire Boulevard, 17th Fl.  
Los Angeles, California 90048  
Telephone: (323) 301-4660  
Facsimile: (323) 301-4676

Attorneys for PLAINTIFF  
ROBERT HUNTER BIDEN

**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA - WESTERN DIVISION**

ROBERT HUNTER BIDEN, an  
individual,

Plaintiff,

vs.

PATRICK M. BYRNE, an individual,  
Defendant.

Case No. 2:23-cv-09430-SVW-PD

*Hon. Stephen V. Wilson*

**DECLARATION OF RICHARD A.  
HARPOOTLIAN IN SUPPORT OF  
PLAINTIFF ROBERT HUNTER  
BIDEN'S NOTICE OF MOTION  
AND MOTION FOR FURTHER  
SANCTIONS AGAINST  
DEFENDANT PATRICK M. BYRNE  
BASED ON THE COURT'S  
AUGUST 5, 2025 ORDER  
DECLINING TO GRANT DEFAULT  
JUDGMENT; CONTINUING  
TRIAL; AND REOPENING  
LIMITED DISCOVERY FOR  
PLAINTIFF**

*[Notice of Motion and Motion;  
Declaration of Bryan M. Sullivan; and  
[Proposed] Order filed and served  
concurrently herewith]*

Date: September 22, 2025  
Time: 1:30 p.m.  
Dept.: Courtroom 10A

Complaint Filed: November 8, 2023  
Trial Date: October 14, 2025

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**DECLARATION OF RICHARD A. HARPOOTLIAN**

I, Richard A. Harpootlian, declare and state as follows:

1. I am a Partner within the law firm of Richard A. Harpootlian, PA, attorneys of record for Plaintiff Robert Hunter Biden (“Plaintiff”) herein. I submit this declaration in support of Plaintiff’s Motion For Further Sanctions Against Defendant Patrick M. Byrne Based On The Court’s August 5, 2025 Order Declining To Grant Default Judgment; Continuing Trial; And Reopening Limited Discovery For Plaintiff. If called as a witness, I would and could testify to the matters contained herein.

2. Plaintiff and all of his legal counsel were ready, willing, and able to commence trial in this matter on July 29, 2025 as scheduled by the Court on March 17, 2025. Indeed, all six members of Plaintiff’s defense team (four attorneys and two paralegals) traveled to Los Angeles, California from the east coast, stayed in hotel rooms, and paid for meals and ride shares in anticipation of the July 29, 2025 trial. However, the July 29, 2025 trial was continued to October 14, 2025 for the reasons stated in the Court’s August 5, 2025 Order Declining To Grant Default Judgment; Continuing Trial; And Reopening Limited Discovery For Plaintiff (the “August 5 Order”). Plaintiff will have to incur those same travel charges for the October 14, 2025 trial date.

3. I am responsible for the billing of time and expenses on this matter for my firm and I have reviewed the expenses incurred for the week of July 28, 2025 to for myself and my colleagues, Phillip Barber, Esq., Ms. Holli Miller, and Ms. Emily Dale, to travel from the east coast to Los Angeles, California for the July 29, 2025 trial. In addition, I paid for the hotel costs for the entire trial team (including Bryan M. Sullivan, Esq., and Zachary Hansen, Esq., of Early Sullivan Wright Gizer & McRae LLP) and bore the costs of most of the meals for the entire trial team. Those expenses are:

- a. \$6,587.75 for flights myself, Phillip Barber, Esq., Ms. Holli Miller, and Ms. Emily Dale, including last minute flight changes
- b. \$19,881 for lodging for the entire trial team

1 c. \$3,349.70 in meals for the entire trial team

2 d. \$745.78 in Uber rides

3 I declare under penalty of perjury under the laws of the United States of America  
4 that the foregoing is true and correct. Executed on this 25<sup>th</sup> day of August, 2025, at  
5 Columbia, South Carolina.

6  
7  
8 /s/ Richard A. Harpootlian  
9 Richard A. Harpootlian

10 5820667.1